

July 7, 1999

13376 S.W. Chelsea Loop
Tigard, OR 97223

Dockets Management Branch (HFA-305) 5 3 7 4 '99 JUL 12 P4:15
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket # 98N-1038, "Irradiation in the Production, Processing, and Handling of Food"

To whom it may concern:

I ask that the FDA retain the current labeling law, the current terminology of "treated with radiation" or "treated by radiation," and the use of the radura symbol on all irradiated foods. I further ask that the FDA avoid any phrase using the word "pasteurization" because it would be misleading. Pasteurization is a non-intrusive process that involves rapid heating and cooling, and this process has a long and established history of benefiting the consumer.

In its initial petition the FDA concluded that irradiation was a "material fact" about the processing of a food, and thus should be disclosed. This material fact has not changed, therefore, clear, concise, and prominent labeling should remain. Consumers have a right to know whether foods they are purchasing have been irradiated.

Some irradiated foods have different texture and spoilage characteristics than untreated foods. Many fruits and vegetables have nutrient losses that are not expected by the consumer. It is known that food irradiation causes radiolytic by-products in residual quantities that can prove to be harmful (for example toxins and/or carcinogens such as benzene).

Regarding the the display of labels, they should be on the front of the packages and large enough to be readily visible. For unpackaged whole foods, a prominent informational display is needed similar to that used for meat products.

It will be important to assess any public health effects that may occur due to the wide spread consumption of irradiated foods, therefore, I believe that the FDA's labeling requirement should not be permitted to expire.

Very truly yours,



Donald L. Merrick

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